

IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

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JUAN BRITO,)	
	Plaintiff,)	
v.)	Civil Action No.: 1:17-cv-93 (LMD/MSN)
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PRECISION LAMINATE WORKSHOP,)	
INC. (d/b/a Precision Countertops), et al.,)	
	Defendants.)	
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**MEMORANDUM IN SUPPORT OF CONSENT MOTION FOR EXTENSION OF TIME
TO FILE RESPONSIVE PLEADINGS**

Defendants, PRECISION LAMINATE WORKSHOP, INC. and MICHAEL MARKOGIANNAKIS (collectively referred to as “Defendants”), by counsel, pursuant to Federal Rule of Civil Procedure 6(b), files this consent motion for an extension of time to answer, plead, or otherwise respond to Plaintiff’s Complaint up to and including March 10, 2017 and states as follows:

1. Plaintiff brings this action against Defendants alleging various claims under the Fair Labor Standards Act as well as a breach of contract claim.

2. Defendants were served with the Complaint on or about February 8, 2017. Accordingly, Defendants’ deadline for response is set for March 1, 2017.

3. Defendants retained undersigned counsel on or around February 14, 2017. Defendants require additional time in which to respond to the allegations in Plaintiff’s Complaint. Furthermore, the parties are exploring the possibility of resolving this matter without judicial intervention.

4. By email dated February 22, 2017, counsel for Plaintiff agreed not to oppose a motion to extend Defendants’ deadline.

5. The requested extension herein is not being sought for improper purposes.

6. Neither the Court nor the parties will be prejudice by the requested extension of time. This is Defendants' first request for an extension. Accordingly, granting the requested extension of time will not cause delay in resolving this action.

7. Counsel for Plaintiff has consented to the relief requested herein.

WHEREFORE, Defendants, PRECISION LAMINATE WORKSHOP, INC. and MICHAEL MARKOGIANNAKIS, respectfully request that the Court grant this consent motion and extend Defendants time in which to answer, plead, or otherwise respond to Plaintiff's Complaint up to and including March 10, 2017. A proposed Order accompanies this motion.

Date: March 1, 2017

Respectfully submitted,

PRECISION LAMINATE WORKSHOP,
INC. and MICHAEL MARKOGIANNAKIS

By: /s/ John C. Bazaz
Counsel

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Certificate of Service

I hereby certify that on March 1, 2017, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the counsel who appear in the CM/ECF system.

Nicholas Marritz, Esq. Legal Aid Justice Center 6066 Leesburg Pike, Suite 520 Falls Church, VA 22041	
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/s/ John C. Bazaz

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